REMARKS

This Response is accompanied by a Request for Continued Examination (RCE) pursuant to 37 CFR 1.114.

This Response follows a recent telephone conference with the Examiner in which the Examiner's comments in reply to the Response to the previous Office Action set forth on pages 4-5 of the present final Office Action were briefly discussed. During the telephone conference, the Examiner generally confirmed Applicants' interpretation of the Examiner's comments as suggesting (subject to any further PTO searching by the Examiner) an opportunity to present an allowable claim along the lines of claim 1 which more distinctly recites a set of interchangeable connector shells with different configurations. The Examiner further suggested during the telephone conference that Applicants file an RCE to ensure entry of any new claims or claim amendments.

In view of the telephone discussion with the Examiner, the foregoing amendments and the following remarks, reconsideration and allowance of this application is respectfully requested.

Claims 1 and 3-17 are pending in this application. Claims 4-11 are allowed. Claims 1, 3 and 12-15 stand finally rejected. Claim 16 has been objected to as being dependent upon a rejected base claim, but the Examiner has indicated that this claim would be allowable if rewritten in independent form including the limitations of the base claim and any intervening claims. Claims 1, 14 and 16 have been amended herein and new claim 17 has been added; no new matter has been introduced.

As set forth in detail in the present application and as previously discussed with the Examiner, Applicants' invention is directed to a new pressure-tight contact device especially of the type employed in connection with a pressure-tight encapsulated electric motor for driving, for example, a compressor used in a vehicle air suspension system. The inventive contact device

includes an insulator extending through and sealed relative to a pressure-tight housing. One or more contact pins (electrically connected to the motor, for example) are retained in and extend through the insulator and are sealed relative to the insulator. A connector shell is positioned on the insulator, sealed relative to the insulator, and affixed to the insulator or the housing. The connector shell includes a terminal receptacle or socket for engaging a separate mating connector attached to an electric connecting cable (i.e., a plug). One or more contact tabs are disposed in the connector shell in secure electrical contact with the contact pin(s) and extend into the terminal socket to engage the mating connector (plug).

The connector shell can be one of a set of interchangeable connector shells each having a different configuration for mating with a corresponding plug. In essence, the connector shell provides a pressure-tight, interchangeable contact assembly interposed between contact pin (e.g., leading to the motor or other encapsulated device) and plug (e.g., leading to current supply lines or further signal lines) -- as explained below, such a novel construction and arrangement is not described or even suggested in any of the references cited by the Examiner in the Office Action.

Applicants have amended independent claim 1 to more distinctly claim the foregoing. No new matter has been introduced.

Claim 14 has been amended as to form.

Applicants have also rewritten claim 16 in appropriate independent form. It is submitted that claim 16 is in form for allowance. Notice to this effect is respectfully requested.

Independent claim 1 and dependent claims 3, 12, 13 and 15 stand finally rejected under 35 U.S.C. §102(b) as being anticipated by Cooper et al. U.S. Patent No. 4,767,350; and dependent claim 14 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Cooper in view of Gerow U.S. Patent No. 5,890,930. Applicants respectfully traverse the foregoing claim rejections. Cooper does not disclose or yield Applicants' device as claimed. Applicants

respectfully submit that significant differences in construction and arrangement exist between the device claimed in the present application and the device disclosed in Cooper that warrant the immediate withdrawal of the claim rejections on anticipation grounds. Cooper does not disclose each element of the rejected claims, and accordingly, the Examiner has not made out a *prima facie* case of anticipation.

Cooper nowhere teaches or suggests the contact device according to the present invention as affirmatively claimed in claim 1 of the present application comprising the interchangeable connector shell with its plug receiving terminal receptacle or "socket" including one or more contact tabs in electrical contact with one or more contact pins extending through the insulator. Applicants specifically traverse the Examiner's interpretation of Cooper as disclosing the contact tab according to the present invention (element 6 in Fig. 1) in the socket contact (510) of the Cooper plug. Contact (510) as an element of the Cooper plug (400) is clearly not relevant to the contact tab of the present invention which forms part of the interchangeable connector shell's receptacle or terminal socket for receiving a plug (*see e.g.*, col. 7, lines 36-38, col. 8, lines 19-21, and Figs. 1, 11, 12 and 18 of Cooper).

Similarly, the Examiner misinterprets peripheral surface (490) of Cooper as disclosing the interchangeable connector shell according to the present invention (element 7 in Fig. 1). Surface (490) of Cooper is also an element of the Cooper plug (400) -- specifically, it is the surface of the plug housing (460) -- and is clearly not relevant to the interchangeable connector shell of the present invention which forms part of the receptacle or terminal socket for receiving a plug (*see e.g.*, col. 8, lines 8-9, and Figs. 1 and 11 of Cooper).

Furthermore, contrary to the Examiner's interpretation of Cooper, element (34) of Cooper does not correspond to the insulator according to the present claimed invention (element 2 in Fig. 1) in which the contact pin(s) (element 4 in Fig. 1) is(are) retained. Even assuming for the sake of argument that element 34 is an insulator of the general type employed in the present

invention under consideration (which it is not), element 34 does not extend through the housing as affirmatively required in claim 1 of the present application (*see e.g.*, Figs. 1 and 2 of Cooper). Extension of the insulator through the housing in accordance with the present invention facilitates the affixation and sealing of the connector shell relative to the insulator – contributing to the pressure-tight characteristic of the claimed inventive device. Applicants note for the record that element 302 of Cooper is not an extension of element 34, but rather is an integral part of bulkhead 300 (*see* Fig. 2 of Cooper).

Accordingly, claim 1 of the present application recites features and structure nowhere found in the Cooper reference, and, thus, Cooper cannot anticipate claim 1.

The Federal Circuit has instructed that anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration. *See W.L. Gore & Assocs. v. Garlock, Inc.*, 220 USPQ 303 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 841 (1984); *see also Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984) (requiring that the prior art reference disclose each element of the claimed invention arranged as in the claim). Considering that the device of the present invention as claimed in independent claim 1 differs in structure and arrangement from the device disclosed in Cooper, as provided above, it is respectfully submitted that the Examiner has not made a *prima facie* case of anticipation, and that claim 1 is thus patentable over Cooper. Notice to this effect is earnestly requested.

It is further submitted that dependent claims 3, 12, 13 and 15-16 are also allowable by reason of their various dependencies from independent claim 1, as well as for the additional features and structure recited therein. Notice to this effect is also earnestly requested.

Regarding the rejection of dependent claim 14 as obvious over the combination of Cooper and Gerow, Applicants respectfully submit that Gerow does not overcome the severe deficiencies of Cooper as argued with respect to independent claim 1. Thus, claim 14 is

respectfully asserted as allowable over the cited combination of references by virtue of its dependency from claim 1, as well as for the additional features and structure recited therein.

Applicants fail to understand the Examiner's reliance on Gerow for its asserted disclosure of projections extending from the contact pin for retaining the pin in the insulator. Applicants' reading of Gerow indicates no teaching or suggestion of any such projections. Thus, Applicants again assert that the Examiner has the burden to specifically identify where the asserted description of such pin projections (as opposed to projections from the insulator passages (26)) can be found in order to substantiate the 35 U.S.C. §103(a) rejection.

In view of the telephone discussion with the Examiner discussed above, Applicants have added new independent claim 17 to provide protection of appropriate scope. No new matter has been introduced (and no additional fee is believed due).

Applicants have made a diligent effort to place this application in condition for allowance, and notice to this effect is earnestly solicited. The Examiner is invited to contact Applicants' undersigned attorneys at the telephone number set forth below if it will advance the prosecution of this case.

No fee is believed due with this Response other than the $790.00 fee for the RCE filed herewith. Please charge any fee deficiency and credit any overpayment to Deposit Account No. 50-0540.

Respectfully submitted,

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